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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CR 2:23-cr-00372-RGK

Plaintiff,

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING INDICTMENT AND  
RELATED DOCUMENTS; DECLARATION OF  
KATHRYNNE N. SEIDEN

v.

WENHENG ZHAO,  
a.k.a. "Thomas Zhao,"

**(UNDER SEAL)**

Defendant.

The government hereby applies ex parte for an order that the indictment and any related documents in the above-titled case (except the arrest warrant for the charged defendant) be kept under seal until August 3, 2023, at 6:00 a.m. PST, at which point the indictment shall be automatically unsealed.

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1        This ex parte application is made pursuant to Federal Rule of  
2 Criminal Procedure 6(e)(4) and is based on the attached declaration  
3 of Kathrynne N. Seiden.

4        Dated: July 27, 2023

Respectfully submitted,

5                                E. MARTIN ESTRADA  
6                                United States Attorney

7                                ANNAMARTINE SALICK  
8                                Assistant United States Attorney  
9                                Chief, National Security Division



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12                                SARAH E. GERDES  
13                                Assistant United States Attorneys

14                                Attorneys for Plaintiff  
15                                UNITED STATES OF AMERICA  
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**DECLARATION OF KATHRYNNE N. SEIDEN**

I, Kathrynne N. Seiden, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys assigned to represent the government in the prosecution of United States v. Wenheng Zhao, the indictment which is being presented to a federal grand jury in the Central District of California on July 28, 2023.

2. Defendant has not been taken into custody on the charges contained in the indictment and has not been informed that he is being named as a defendant in the indictment to be presented to the grand jury on July 28, 2023. The likelihood of apprehending defendant might be jeopardized if the indictment in this case were made publicly available before defendant is taken into custody on the indictment.

3. The government anticipates that it will arrest defendant on August 2, 2023, and will execute various search warrants that same day. The government also anticipates conducting interviews of persons associated with defendant throughout the day on August 2, 2023. The execution of those warrants and interviews may be jeopardized if knowledge of the indictment becomes public before the government is able to complete its operation.

4. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrant) be sealed and remain so until 6:00 a.m. PST on August 3, 2023.

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1           5. I declare under penalty of perjury under the laws of the  
2 United States of America that the foregoing is true and correct and  
3 that this declaration is executed at Los Angeles, California, on July  
4 27, 2023.



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KATHRYNNE N. SEIDEN